

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>10-</u>
v.	:	DATE FILED: <u>July 2010</u>
ANGELA STARR	:	VIOLATIONS:
	:	18 U.S.C. § 371 (conspiracy - 2 counts)
	:	18 U.S.C. § 1344 (bank fraud - 3 counts)
	:	18 U.S.C. § 1028A (aggravated identity
	:	theft - 2 counts)
	:	Notice of forfeiture
	:	

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this indictment:

1. Bank of America was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation ("FDIC"), certificate number 3150.
2. Harleysville Bank was a financial institution, the deposits of which were insured by the FDIC, certificate number 31461.
3. From in or about July 2008 through on or about February 24, 2009, in the Eastern District of Pennsylvania and elsewhere, defendant

ANGELA STARR

conspired and agreed, with others known and unknown to the United States Attorney, to commit offenses against the United States, that is, to knowingly execute, and attempt to execute, and aid and abet the execution of, bank fraud, in violation of Title 18, United States Code, Section 1344, and to knowingly and without lawful authority use a means of identification of another person

during and in relation to bank fraud, in violation of Title 18, United States Code, Section 1028A(a)(1).

MANNER AND MEANS

4. It was part of the conspiracy that defendant ANGELA STARR and others used the names, dates of births, addresses, social security numbers, bank account numbers, and other means of identification of victims to cash fraudulent checks drawn on the accounts of customers of banks, including Bank of America and Harleysville Bank, to enrich themselves and to defraud these banks by presenting and cashing the fraudulent checks at teller windows.

It was further a part of the conspiracy that:

5. Defendant ANGELA STARR acted as a “check runner,” using false identification to cash fraudulent checks drawn on the bank accounts of customers of the banks. In that capacity, defendant STARR performed some or all of the following:

- a. she received, from Co-conspirator #1, a person known to the United States Attorney, and others known and unknown to the United States Attorney, personal identifying information for R.C., including that person’s name, address, and date of birth.
- b. she received, from Co-conspirator #1 a fraudulent Pennsylvania driver’s license with the personal identification information of R.C. which contained a photograph of Starr.
- c. she received from Co-conspirator #1 counterfeit checks that were payable to R.C. and were drawn on the accounts of customers of Bank of America or Harleysville Bank.

d. she was instructed by Co-conspirator #1 to cash the counterfeit checks issued in the name of R.C.

e. she was provided by others with transportation to and from the banks to cash fraudulent checks drawn on the bank customers' account;

f. she gave the proceeds received from making each fraudulent transaction to others; and

g. she was paid for her services for making the fraudulent transactions.

6. Defendant ANGELA STARR fraudulently obtained, and aided and abetted the obtaining of, more than \$1,000 from the making of fraudulent transactions.

OVERT ACTS

In furtherance of the conspiracy, defendant ANGELA STARR and others, known and unknown to the United States, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. Co-conspirator #1 provided Starr with a fraudulent Pennsylvania driver's license in the name of R.C. but with a photograph of Starr.

2. Co-conspirator #1 provided Starr with a counterfeit check, in the amount of \$1,932.46, issued in the name of R.C. and drawn on CTM Media, a customer of the Bank of America.

3. On or about January 20, 2009, Starr attempted to cash the check for \$1,932.46, at the Bank of America branch at the North Wales Plaza Shopping Center in Montgomery County, Pennsylvania.

4. Co-conspirator #1 provided Starr with a counterfeit check, in the amount of \$1,864.76, issued in the name of R.C., and drawn on Brilliant Spirit, Inc., a customer of Harleysville Bank.

5. On or about February 24, 2009, Starr attempted to cash the check for \$1,864.76, at the Harleysville Bank branch in the Meadowbrook Plaza in Montgomery County, Pennsylvania.

6. Co-conspirator #1 provided Starr with a fraudulent check, in the amount of \$1,964.76, issued in the name of R.C., and drawn on Brilliant Spirit, Inc.

7. On or about February 24, 2009, Starr cashed the check for \$1,964.76, at the Harleysville Bank branch on North Broad Street in Montgomery County.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE UNITED STATES ATTORNEY CHARGES THAT:

1. Paragraphs 1 and 4, and overt acts 1, 2, and 3 of Count One are incorporated here.

2. From in or about July, 2008 to on or about January 20, 2009, in the Eastern District of Pennsylvania and elsewhere, defendant

ANGELA STARR

knowingly executed and attempted to execute, and aided and abetted the execution of, a scheme to defraud Bank of America, and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. Defendant ANGELA STARR attempted to cash a counterfeit check drawn on the account of CTM Media Group, a customer of Bank of America, made payable to R.C. and used a false identification document of R.C, so that she could share the proceeds with others.

4. In furtherance of the scheme, on or about January 20, 2009, at a Bank of America branch on North Wales Road, in Montgomery County, Pennsylvania, defendant ANGELA STARR attempted to cash, at a Bank of America branch, a counterfeit check issued to R.C ., in the amount of \$1,942.82, drawn on the account of CTM Media.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT THREE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. Paragraphs 2 and 4, and overt acts 1 and 4 through 7 of Count One are incorporated here.

2. From in or about July, 2008 to on or about February 24, 2009, in the Eastern District of Pennsylvania and elsewhere, defendant

ANGELA STARR

knowingly executed and attempted to execute, and aided and abetted the execution of, a scheme to defraud Harleysville Bank, and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. Defendant ANGELA STARR cashed and attempted to cash counterfeit checks drawn on the account of Brilliant Spirit, Inc, a customer of Harleysville Bank, made payable to R.C., and used false identification in the name of R.C., and shared the proceeds with others.

4. In furtherance of the scheme, on or about February 24, 2009, at a Harleysville Bank branch on North Broad Street, in Montgomery County, defendant ANGELA STARR fraudulently cashed a counterfeit check in the amount of \$1,964.76 drawn on the account of Brilliant Spirit, Inc.

5. In furtherance of the scheme, on or about February 24, 2009, at a Harleysville Bank branch in the Meadowbrook Plaza in Montgomery County, defendant

ANGELA STARR attempted to cash a counterfeit check in the amount of \$1,864.76 from the account of Brilliant Spirit, Inc.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT FOUR

THE UNITED STATES ATTORNEY CHARGES THAT:

On or about February 24, 2009, in the Eastern District of Pennsylvania, defendant

ANGELA STARR

knowingly and without lawful authority, possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name and identifying information of R.C., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

COUNT FIVE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this indictment:

1. PNC Bank was a financial institution, the deposits of which were insured by the FDIC, certificate number 6384.

2. From on or about May 5, 2009, in the Eastern District of Pennsylvania, defendant

ANGELA STARR

conspired and agreed, with others known and unknown to the United States Attorney, to commit offenses against the United States, that is, to knowingly execute, and attempt to execute, and aid and abet the execution of, bank fraud, in violation of Title 18, United States Code, Section 1344, and to knowingly and without lawful authority use a means of identification of another person during and in relation to bank fraud, in violation of Title 18, United States Code, Section 1028A(a)(1).

MANNER AND MEANS

3. It was part of the conspiracy that defendant ANGELA STARR and others used the names, dates of births, addresses, social security numbers, bank account numbers, and other means of identification of a customer of PNC Bank to enrich themselves and defraud this bank by posing as a customer of the bank at the teller windows and withdrawing funds from the customer's account.

It was further a part of the conspiracy that:

4. Defendant ANGELA STARR acted as a “check runner,” posing as various bank customers to make fraudulent withdrawals from the bank accounts of those customers. In that capacity, defendant STARR performed some or all of the following:

a. she received, from Co-conspirator #2, a person known to the United States Attorney, and others, known and unknown to the United States Attorney, personal identifying information for J.R., a customer of PNC Bank, including J.R.’s name, date of birth, address, and bank account number.

b. she received, in addition to the J.R.’s account information, false photographic identification in the name of J.R.;

c. she was instructed by others to make a fraudulent withdrawal from the bank accounts of J.R.;

d. she was provided by others with transportation to and from the bank to make the fraudulent withdrawal from J.R.’s account;

e. she gave the proceeds received from making the fraudulent withdrawal to others; and

f. she was paid for her services in making the fraudulent withdrawals.

5. Defendant ANGELA STARR fraudulently obtained, and aided and abetted the obtaining of \$3,040 as a result of the fraudulent withdrawal.

OVERT ACTS

In furtherance of the conspiracy, defendant ANGELA STARR and others, known and unknown to the United States Attorney, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. On or about May 5, 2009, defendant ANGELA STARR fraudulently withdrew funds in the amount of approximately \$3,040 from J.R.'s PNC Bank account at a branch located at 2385 Welsh Road, in Willow Grove, Pennsylvania, using the account number of J.R., and presenting fraudulent identification in the name of J.R., which had been provided to defendant STARR by Co-conspirator #2.

All in violation of Title 18, United States Code, Section 371.

COUNT SIX

THE UNITED STATES ATTORNEY CHARGES THAT:

1. Paragraphs 1 and 3 through 5, and overt act 1 of Count Five are incorporated here.
2. On or about May 5, 2009, in the Eastern District of Pennsylvania and elsewhere, defendant

ANGELA STARR

knowingly executed and attempted to execute, and aided and abetted the execution of, a scheme to defraud PNC Bank, and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. Defendant ANGELA STARR used stolen account information and false identification documents of J.R., a person known to the United States Attorney and an account holder of PNC Bank, to fraudulently withdraw money from the account of J.R. and share the proceeds with others.
4. In furtherance of the scheme, defendant ANGELA STARR made a fraudulent withdrawal from the PNC Bank on Welsh Road in Willow Grove, Pennsylvania, in the amount of \$3,040.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT SEVEN

THE UNITED STATES ATTORNEY CHARGES THAT:

On or about May 5, 2009, in the Eastern District of Pennsylvania and elsewhere,
defendant

ANGELA STARR

knowingly and without lawful authority, possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name and identifying information of J.R., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 371 and 1344 set forth in this indictment, defendant

ANGELA STARR

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses, as charged in this indictment, including, but not limited to, the sum of \$5,004.76.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b),

incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2).

ZANE DAVID MEMEGER
United States Attorney